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**From:** Orme-Zavaleta, Jennifer [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=3C5A111DC377411595E5B24B5D96146B-ORME-ZAVALITA, JENNIFER]  
**Sent:** 3/11/2021 5:34:03 PM  
**To:** Robbins, Chris [Robbins.Chris@epa.gov]; Rodan, Bruce [rodan.bruce@epa.gov]; Jones, Samantha [Jones.Samantha@epa.gov]  
**CC:** Matthews, Lisa [Matthews.Lisa@epa.gov]  
**Subject:** RE: ITRC 1,4-dioxane guidance document: ORD comments on chapter 5 and app C

Excellent!

Jennifer Orme-Zavaleta, PhD  
Acting Assistant Administrator, and  
Principal Deputy Assistant Administrator  
Office of Research and Development  
US Environmental Protection Agency

DC  
Cell: Ex. 6 Personal Privacy (PP)

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**From:** Robbins, Chris <Robbins.Chris@epa.gov>  
**Sent:** Thursday, March 11, 2021 12:33 PM  
**To:** Orme-Zavaleta, Jennifer <Orme-Zavaleta.Jennifer@epa.gov>; Rodan, Bruce <rodan.bruce@epa.gov>; Jones, Samantha <Jones.Samantha@epa.gov>  
**Cc:** Matthews, Lisa <Matthews.Lisa@epa.gov>  
**Subject:** Fwd: ITRC 1,4-dioxane guidance document: ORD comments on chapter 5 and app C

Good outcome. Bruce and Samantha thanks for your help!

Chris

Sent from my iPhone

Begin forwarded message:

**From:** Patricia Reyes <[preyes@ecos.org](mailto:preyes@ecos.org)>  
**Date:** March 11, 2021 at 12:31:20 PM EST  
**To:** "Matthews, Lisa" <[Matthews.Lisa@epa.gov](mailto:Matthews.Lisa@epa.gov)>  
**Cc:** "Robbins, Chris" <[Robbins.Chris@epa.gov](mailto:Robbins.Chris@epa.gov)>, "Chapman, Randy (DEQ)" <[Randy.Chapman@deq.virginia.gov](mailto:Randy.Chapman@deq.virginia.gov)>  
**Subject:** Re: ITRC 1,4-dioxane guidance document: ORD comments on chapter 5 and app C

Thank you very very much Lisa and Chris. Once we heard from NJDEP, we also went out for a new 3rd party review by Vince at CA OEHHHA and we met with him last night. His comments are consistent with what you provided, as well as NJDEP. We will remove Appendix C today from the site and we will meet with the team to make the edits to Section 5 as soon as we can. Our next concern is the EPA CLU-In training that the team is presenting at the end of March that already has well over 500 registrants. We will review those slides soon to ensure consistency with the new comments we received.

Lots of lessons learned from this issue that we will begin to discuss next week on our Board call. The first issue is how do we get the appropriate peer reviews of our documents before they are final and how do we update them when drafts become final etc.

Thanks again,  
Patty

Patricia Catherwood Reyes  
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*"Do the best you can until you know better; then when you know better, do better."*

On Thu, Mar 11, 2021 at 12:24 PM Matthews, Lisa <[Matthews.Lisa@epa.gov](mailto:Matthews.Lisa@epa.gov)> wrote:

Hi Patty,

Due to the concerns raised by Gloria Post (NJDEP), Chris Robbins asked our folks to take a look at the final ITRC document on 1,4-Dioxane, focusing our review on the Toxicity Chapter 5 and Appendix C. EPA is concerned about statements that appear to question EPA's approaches to cancer risk assessment generally, and not just the approaches used for 1,4-Dioxane. Specifically, the ITRC document gives undue validity to publications that question the use of linear non-threshold approaches for radiation and chemical-induced cancer. We are also concerned about the heavy reliance in the ITRC document on the draft Health Canada report as a Tier 1 study, despite its then draft status and the absence of peer review.

Attached are ORD's comments on the Toxicity Chapter 5 and Appendix C. Ultimately, this is ITRC's document and it will be up to you to decide what revisions may be needed for the document. However, ORD did want you to be aware of our comments.

Lisa

**Lisa Matthews**

Senior Advisor and State Liaison

US EPA Office of Research and Development

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